IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Northern Division

* JEFFREY F. LAWRENCE, et al. **Plaintiffs** * * Civil Action # RDB-02-CV-3224 v. THE "IMAGINE...!" YACHT, LLC, et al. * Defendants THE "IMAGINE...!" YACHT, LLC Third Party Plaintiff v. SHER & BLACKWELL, LLP Third Party Defendant

AMENDED CONSENT MOTION TO AMEND SCHEDULING ORDER

Defendant, the "IMAGINE . . . !" Yacht, LLC, by its attorneys, Robert H. Bouse, Jr. and Jonathan A. Cusson, hereby files this Motion to Amend Scheduling Order with the consent of all parties and for good cause states as follows:

1. Presently, the Scheduling Order, as entered by this Court on April 4, 2003, indicates that Defendant must designate experts by July 2, 2003, that Plaintiff must

disclose rebuttal experts by July 14, 2003, that Rule 26(e)(2) supplementation is due by July 23, 2003, that the discovery deadline is August 18, 2003, that requests for admission are due by August 25, 2003, and that the dispositive pretrial motions are due by September 15, 2003.

- 2. By an agreement of counsel, because of the factually intense nature of this action, including the anticipated need for multiple expert witnesses, the parties agreed to extend the Scheduling Order to add sixty (60) days to each deadline.
- 3. The previously filed and granted Motion to Amend only added thirty (30) days to each deadline.
- 4. The parties wish to reflect their original intent with respect to the deadlines pertaining to expert disclosures.
- 5. Therefore, the proposed deadline for Defendant to name its experts shall be August 30, 2003. The proposed deadline for Plaintiff to disclose rebuttal experts is September 6, 2003. The proposed deadline for Rule 26(e)(2) supplementation is September 13, 2003.
- 6. The proposed discovery deadline for the submission of a status report shall remain October 7, 2003. The proposed deadline for requests for admissions shall remain October 14, 2003. Lastly, the proposed deadline for dispositive pretrial motions shall remain November 4, 2003.
- 7. This Motion is made with the consent of all parties in an effort to facilitate discovery and may result in the resolution of this matter short of trial.

WHEREFORE, the parties pray that this Court grant their Consent Motion to Amend Scheduling Order, as previously agreed upon and set forth herein.

Robert H. Bouse, Jr., #01926 Jonathan A. Cusson #27095 Anderson, Coe & King, LLP 201 North Charles Street Suite 2000 Baltimore, Maryland 21201 (410) 752-1630

RDER GRANTED AS PRAYED:		
day of	, 2002	
chard D. Bennett, U	LS. District Judge	